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January 10, 2025

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Bernier et al. v. Gard Recycling, Inc. et al.,  
Case No.: 23-CV-761 (VSB)

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Dear Judge Broderick:

This firm represents Plaintiffs in the above-referenced matter. We write to request (1) an extension of the deadline to file the joint letter until January 17, 2025 and (2) an adjournment of the status conference scheduled for January 17, 2025. This is the second request of this kind.

The reason for the request to extend the deadline to submit the joint letter is that I have been unable to confer with Defendants to submit the joint letter. I reached out to Defendant Alex Doljansky repeatedly this week but was only able to reach him by telephone today. When I spoke with him, he expressed surprise that he was no longer represented by counsel and indicated that he needed to speak with his former counsel to understand his options. I have not yet heard back from him, although I expect to remain in communication with him.

Separately, although Defendants' prior counsel provided contact information for Defendant Doljansky, he did not possess contact information for Defendant Guastavo Rodriguez and therefore was unable to provide it. Plaintiffs therefore are attempting to obtain contact information for Defendant Rodriguez. We therefore ask for an additional week to submit the joint letter.

Plaintiffs also request that the Court adjourn the January 17, 2025 conference. The reason for this request is that I have at the same date and time an in-person pretrial conference in the Eastern District of New York in a case that is scheduled to go to trial on March 3, 2025.

We thank the Court for its consideration of this letter.

Respectfully submitted,

-----/s/-----  
Michael Taubenfeld

**SO ORDERED:**

  
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**HON. VERNON S. BRODERICK**  
**UNITED STATES DISTRICT JUDGE**

Date: January 13, 2025

The parties shall submit their joint letter on or before January 24, 2025.

This will be the final extension request granted. The parties were reminded in my January 3, 2025 order granting the previous extension request that extension requests must comply with Rule 1.G of my Individual Rules & practices in Civil Cases, which requires extension requests to "be made at least 48 hours prior to the original due date" absent an emergency. (Doc. 57.) This extension request is made, again, on the original due date.

The post-discovery conference currently scheduled for January 17, 2025 at 11:00 A.M. is adjourned until January 31, 2025 at 11:00 A.M. The dial-in for telephonic conferences is 1-855-244-8681, and the access code is 2309 3085 835. There is no attendee ID.